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5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
10 LITIGATION

11 This Document Relates to:
12 ALL CASES
13

Case No. 23-md-03084-CRB

**AFFIDAVIT OF TIFFANY R. ELLIS IN
SUPPORT OF PLAINTIFFS' LIST OF
DISPUTED ENTRIES FOR SPECIAL
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for
6 Special Master Review on May 2, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for
8 Special Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs
9 incorporate the brief to support the specific reasons each entry on the List of Disputed Entries
10 was challenged. The Brief included the general background of the privilege dispute process to
11 date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a
12 general argument for the challenges Plaintiffs raised.

13 4. The Plaintiffs' List of Disputed Entries for Special Master Review and Updated
14 List of Disputed Entries for Special Master Review provided on April 29, 2025 and May 2, 2025
15 respectively contain entries still in dispute for custodian Travis Kalanick.

16 5. The Plaintiffs' List of Disputed Entries for Special Master Review and Updated
17 List of Disputed Entries for Special Master Review provided on April 29, 2025 and May 2, 2025
18 respectively do not contain any entries for the custodians that overlapped with custodians already
19 submitted to the Special Master for review.

20 **Travis Kalanick**

21 6. Defendants included approximately 316 entries for Travis Kalanick across its
22 Tranche 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.

23 7. Plaintiffs originally challenged approximately 114 of these 316 entries.

24 8. As of January 31, 2025¹, Defendants withdrew their claim of privilege from 8
25 entries in full and 17 entries in part.

26 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log

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28 ¹ Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log
Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2.
See ECF No. 2357.

1 after Defendants re-reviewed all entries in dispute pursuant to Master Order No. 2. Defendants
2 withdrew their claim of privilege from 43 entries in full and 42 entries in part.

3 10. Defendants provided Plaintiffs with a revised Privilege Log on April 29, 2025. In
4 total, to date, Defendants logged 485 entries for Travis Kalanick and have withdrawn their claim
5 of privilege from approximately 58 entries in full and 50 entries in part.

6 11. On March 25, 2025, Plaintiffs provided the Special Master and Defendants with a
7 list of 11 entries in dispute for Travis Kalanick following a review of Uber's revised privilege log
8 that included updated or additional information provided by Uber, documents produced with
9 redactions, or lessons learned from Judge Cisneros' privilege orders and Defendants' newer
10 privilege log.

11 12. On April 25, 2025, Plaintiffs provided the Special Master and Defendants with a
12 supplemental list of 37 entries for Travis Kalanick from Defendants' Marh 24, 2025, April 1,
13 2025, April 8, 2025, April 11, 2025, April 16, 2025, and April 21, 2025 privilege logs.

14 13. On April 29, 2025, Defendants provided a written response to Plaintiffs' list and
15 the parties met and conferred. During the conferral, Defendants informed Plaintiffs that they
16 withdrew their claim to 7 entries in full and 5 entries in part since the submission on March 25,
17 2025. Additionally, Defendants represented that they would withdraw their privilege claim from
18 5 more entries in full and 15 more entries in part.

19 14. On April 29, 2025, Plaintiffs provided the Special Master and Defendants with a
20 list of 34 entries that remain in dispute for Travis Kalanick.

21 15. On May 2, 2025, Plaintiffs had the opportunity to review the newly produced
22 entries and provided the Special Master and Defendants with a list of 14 entries that remain in
23 dispute for Travis Kalanick.

24 Executed this 2nd day of May, 2025 in San Francisco, CA.

25
26 /s/ Tiffany R. Ellis
27 Tiffany R. Ellis
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